

MEMORANDUM FOR: Susan B. Fruchter  
Acting NEPA Coordinator

FROM: Charles W. Challstrom  
Acting Director, National Geodetic Survey

SUBJECT: DEIS-0002-01 Idaho High-Level Waste and Facilities Disposition,  
Boise, Idaho

The subject statement has been reviewed within the areas of the National Geodetic Survey's (NGS) responsibility and expertise and in terms of the impact of the proposed actions on NGS activities and projects.

32-1  
VIII.F(1) [All available geodetic control information about horizontal and vertical geodetic control monuments in the subject area is contained on the NGS home page at the following Internet World Wide Web address: <http://www.ngs.noaa.gov>. After entering the NGS home page, please access the topic "Products and Services" and then access the menu item "Data Sheet." This menu item will allow you to directly access geodetic control monument information from the NGS data base for the subject area project. This information should be reviewed for identifying the location and designation of any geodetic control monuments that may be affected by the proposed project.

32-2  
VIII.F(1) If there are any planned activities which will disturb or destroy these monuments, NGS requires not less than 90 days' notification in advance of such activities in order to plan for their relocation. [NGS recommends that funding for this project includes the cost of any relocation(s) required.]

For further information about these monuments, please contact Rick Yorczyk; SSMC3 8636, NOAA, N/NGS; 1315 East West Highway; Silver Spring, Maryland 20910; telephone: 301-713-3230 x142; fax: 301-713-4175.

W. Brad DeBow  
2238 West 1000 South  
Rexburg, Idaho 83440-3754

February 25, 2000

Attn: Idaho HLW & FD EIS  
c/o: T. L. Wichmann, Document Director  
U.S. Department of Energy  
Idaho Operations Office  
850 Energy Drive, Mail Stop: 1108  
Idaho Falls, Idaho 83401-1563

HLW & FD



EIS PROJECT - AR/Ff  
Control # DC-33

Dear Sir:

33-1  
VIII.D(1) I would like to submit the following comment on the Idaho HLW & FD EIS. This comment applies to the selection of a final option that both the State of Idaho and the DOE can agree on, and to three of the alternatives listed in the EIS that will be able to gain this joint agreement if my comment on the upgrade of the NWCF Calciner is accepted. [The three options to which I wish to comment are the Separations Alternative Planning Basis Option, the Non-Separations Alternative Hot Isostatic Pressed Option, and the Non-Separations Alternative Direct Cement Waste Option.]

33-2  
VIII.D(1) These three options all involve pre-treatment of the liquid tank farm waste with the NWCF Calciner. This pre-treatment is the only way that the Settlement Agreement requirement of having the Sodium Bearing Waste (SBW) removed from the tank farm by 2012 has a chance of being met. It is my opinion and my input to this process that this portion of the Settlement Agreement must be complied with whichever option is finally selected. [The liquid waste is by far the most hazardous of the various forms of waste] and the State of Idaho was correct in insisting this form be eliminated by the soonest possible date, which is 2012. As a citizen of the area near where that liquid waste is stored, I cannot emphasize enough my comment that the 2012 date previously agreed to in a court ordered Settlement Agreement with the State of Idaho must be complied with.

33-3  
VIII.C(1) It appears to me that this EIS process is being used as a vehicle to abrogate the Settlement Agreement with the State of Idaho. Specifically, it appears that the compliance with the 2012 date for the conversion of the liquid waste to a solid form is at risk. The EIS states that it would be difficult to stop using the tank farm by 2012. Oddly enough, the State of Idaho itself seems responsible for this attempted abrogation of responsibility through its insistence on the requirement to permit and MACT upgrade the Calciner. This permit and upgrade step is written in to every option in which the Calciner would be used to pre-treat the liquid waste. [The cost, in both dollars and more importantly time, to accomplish the MACT upgrade on the Calciner is not acceptable.] [The options that involve running the Calciner must be considered without the permit and MACT upgrade aspects. This would allow the Calciner to continue operation after June 1, 2000 and accomplish the most critical aspect of the Settlement Agreement, the elimination of the liquid SBW by 2012.]

- New Information -

Idaho HLW & FD EIS

D-43

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33-6  
III.C(9) The State of Idaho is telling the DOE on one hand that the liquid SBW must be solidified by 2012, and on the other hand that the only method of accomplishing that feat, the use of the Calcliner, must be halted by June 1, 2000 because of emission requirements. I do not consider this acceptable behavior on the part of my State elected representatives, and so inform them by copy of this letter. The Calcliner has operated for a number of years without a MACT upgrade and is perfectly capable of completing its mission without impacting the environment.

33-7  
VII.D(2) Instead of using this EIS as a vehicle to abrogate the requirement to solidify the liquid waste by 2012, DOE should instead be confronting the issue directly with the State of Idaho. The Calcliner is not an incinerator, by EPA's or any other definition of the word. I have looked at 40 CFR Part 60, et al. NESHAPS Standards, and have two conclusions. The Calcliner does not fit the EPA definition of a Hazardous Waste Combustor, and the emissions requirements would accomplish nothing meaningful in the desert environment where the Calcliner is located. On the other hand, the solidification of the liquid SBW waste by 2012 through the operation of the Calcliner through this period would greatly reduce the risk to the subterranean environment. It is a shame our State bureaucrats seem unable to grasp these simple facts.

33-10  
III.C(6) To elaborate on one area of the NESHAPS Standards the State bureaucrats are attempting to impose on the Calcliner, on page 52832 of this document, the MACT rules are established for three source categories, namely: Hazardous waste burning incinerators, hazardous waste burning cement kilns, and hazardous waste burning lightweight aggregate kilns. These three source categories are referred to collectively as hazardous waste combustors in the EPA regulations. The NWCF Calcliner fits none of these categories. It is not a combustor, it is a Calcliner. The Calcliner is a much higher technology facility than the commercial waste combustors that may be put up by commercial industries and utilities. A reading of the EPA regulations makes it very clear they were directed at the low technology units put up by commercial industrial plants and city utilities.

33-11  
III.C(5) To further support these facts, I would like to reference you to an EPA document. EPA530-R-97-057 PB98-108 129, November, 1997 is a Hotline Training Module for EPA hotline phone specialists on incineration regulations and definitions. In this document, incineration is defined as a technology to destroy hazardous waste. the Calcliner certainly does not destroy the waste, but converts it from liquid to solid state.

33-12  
III.C(6) Another EPA document defining incinerators is the Final Technical Support Document for HWCMACT Standards, July, 1999. This document has a detailed description of incinerators that is very clear does not include the NWCF Calcliner process. As an example, in its definition of a fluidized bed incinerator it describes how the bed media acts to scrub the waste particles, exposing fresh surface by the abrasion process which encourages rapid combustion of the waste. The Calcliner process can be described as the opposite of that, where the waste particles are encouraged to adhere to the bed material and are not combusted, but carried off as waste transformed from liquid to solid.

33-13  
III.C(4) The DOE must face this problem directly with the State and obtain concurrence for the continued operation of the Calcliner beyond June 1, 2000.

Very truly yours,

*W. Brad DeBow*  
W. Brad DeBow

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HLW & FD

EIS PROJECT - (AR) PF

Control # *MC-34*

TRI-CITY INDUSTRIAL DEVELOPMENT COUNCIL

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February 28, 2000

Mr. Thomas L. Wichmann, Document Manager  
U.S. DOE, Idaho Operations Office  
850 Energy Drive, MS 1108  
Idaho Falls, ID 83401-1563

Public Comments Regarding  
Idaho HLW & FD EIS

Dear Mr. Wichmann:

We are submitting herewith a copy of our testimony which was presented at the February 24, 2000 public hearing in Pasco, WA. This submittal is for record purposes and contains several minor editorial corrections from the public comments.

Very truly yours,

*Sam Volpentest*  
Sam Volpentest  
Executive Vice President